

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Regina Pickett

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Office of Legislative Services

RECEIVED

NOV - 2 2023

AT 8:30 M
CLERK, U.S. DISTRICT COURT - D.N.J.

COMPLAINT

Jury Trial: Yes No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name
	Street Address
	County, City
	State & Zip Code
	Telephone Number

Regina Pickett
308 Sewell Ave
Mercer, Trenton
New Jersey 08610
609-954-4655

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Office of Legislative Services
Street Address 145 W. State St.
County, City Mercer, Trenton
State & Zip Code New Jersey 08625

Defendant No. 2

Name _____
Street Address _____
County, City _____
State & Zip Code _____

Defendant No. 3

Name _____
Street Address _____
County, City _____
State & Zip Code _____

Defendant No. 4

Name _____
Street Address _____
County, City _____
State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

Federal Questions Diversity of Citizenship
 U.S. Government Plaintiff U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

SEE ATTACHED

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

- A. Where did the events giving rise to your claim(s) occur? See ATTACHED

- B. What date and approximate time did the events giving rise to your claim(s) occur? _____

See ATTACHED

- C. Facts: _____

What happened to you?

See ATTACHED

Who did what?

Was anyone else involved?

Who else saw what happened?

See ATTACHED

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

See Attached

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

See Attached

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 2 day of November, 2023

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

306 Seven Ave

Trenton, N.J.

08610

609-954-4055

GINA.GEGLIO@GMAIL.COM

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff

CERTIFICATION OF SERVICE

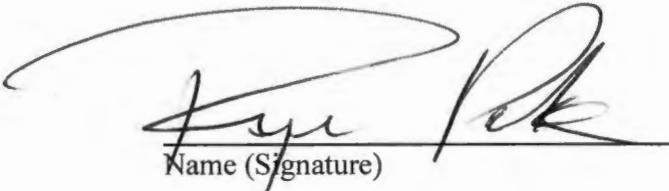
I, Regina R. Keket, certify that a copy of my motion was served
(Name of Moving Party)
by Mail on November 2, 2023 upon: **RECEIVED**
(Mail, Personal Service, etc.) (Date)

NUV - 2 2023

Achchana Ranasinghe AT 8:30 CLERK, U.S. DISTRICT COURT - DN.
(Name of Opposing Party) M

Office of the Attorney General
Division of Law
P.O. Box 112 Richard J. Hughes Justice Complex
(Address of Opposing Party) Trenton, N.J. 08625-0117

Name (Signature)



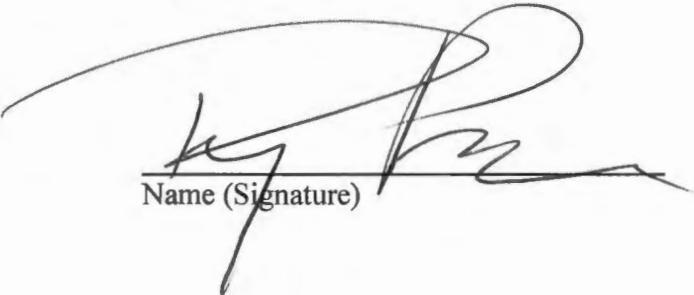
CERTIFICATION OF SERVICE

I, Regina Pickett,
(Name of Moving Party) certify that a copy of my motion was served
by Certified Mail
(Mail, Personal Service, etc.) on November 2, 2023 upon:

Roger Lai
(Name of Opposing Party)

P.O. Box 68 State House Annex Room 210
Trenton, NJ 08625

(Address of Opposing Party)


Name (Signature)

1 Roger Lai
2 PO BOX 68 STATE HOUSE ANNEX, ROOM 210
Trenton, NJ 08625

3 ACHCHANA RANASINGHE
4 OFFICE OF THE ATTORNEY GENERAL, DIVISION OF LAW
5 PO BOX 112 RICHARD J HUGHES JUSTICE COMPLEX
TRENTON, NEW JERSEY 08625-0117

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEW JERSEY**

8 **REGINA PICKETT,**

Case No.: Number

9 **Plaintiff,**

PLEADING TITLE

10 **vs.**

11 **OFFICE OF LEGISLATIVE SERVICES,**

12 **Defendant**

13 Plaintiff, Regina Pickett, by way of Complaint against Defendants, avers:

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15
16 1. Plaintiff, Regina Pickett, is an individual residing at, 306 SEWELL
17 AVENUE, Trenton, New Jersey 08610.

18
19
20 2. Defendant, Office of Legislative Services, is an agency of the Legislative
21 Branch of the State Government of New Jersey that is governed by the New Jersey
22 Legislative Services Commission, located at 145 West State Street Trenton, NJ 08625.

23
24 3. On July 20, 1987, Plaintiff, Regina Pickett began employment with the
25 Office of Legislative Services. Nicholas Behmke began his employment as director of

1 Data Management Unit with the Office of Legislative Services, in August 2018. The unit
2 was renamed to Information Technology Unit in 2019.
3

4 4. In March of 2021, Nicholas Behmke in collaboration with Human
5 Resource Director (Christin Knox) came together to implement a policy directly used to
6 discriminate against me. Throughout the year of 2021 into 2022, disparate treatment
7 ensued.
8

9
10 Plaintiff brings this action under Title VII of the Civil Rights Act of 1964
11 (42 U.S.C. § 2000e et seq.) Racial discrimination in the workplace by implementing a
12 policy that enabled bias and unequal treatment. For this Complaint alleges:
13

14
15 5. On March 19, 2020, the Office of Legislative Services transitioned to
16 remote work due to the COVID-19 pandemic. On July 20, 2020, Peri
17 Horowitz, the Executive Director, and Christian Knox, the HR Director,
18 created a hybrid onsite and remote work arrangement for the Office of
19 Legislative Services (OLS) employees. The policy included a provision
20 stating that employees with high-risk medical conditions could continue
21 to work remote as directed by a medical professional if supported with
22 documentation.
23

24
25 6. On July 14, 2020, per my doctor's recommendation, I submitted
26 documentation to continue working remote. I received written approval
27
28

1 from Human Resources on July 30, 2020, to continue remote work until
2 January 14, 2021.

3
4 7. On January 4, 2021, I submitted updated documentation to continue
5 working remote (as the pandemic was still in full swing) and I obtained
6 approval to continue remote work until June 18, 2021.

7
8 8. On March 1, 2021, I received an email from Christian Knox, inquiring
9 of my availability to attend a zoom call to which I inquired about the
10 basis of the meeting and did not receive correspondence. Christian Knox
11 scheduled the zoom call for March 3, 2021. Attendees were myself, my
12 director Nicholas Behmke, and Christin Knox. During this meeting, the
13 defendants informed me that OLS would no longer support a COVID-
14 19 telework accommodation for Network Engineers to work remote
15 due to an underlying health condition or dependent care. Several
16 instances of bias and unequal treatment began once I returned to the
17 workplace on March 22, 2021, which raised concerns.

18
19 9. On March 30, 2021, Krista LaBoy, a Caucasian Network Engineer,
20 requested to work remote for dependent care on April 1, 2021, and
21 received approval from Mitchell Blustein. Similarly, Charles Green, a
22 Caucasian Network Engineer, requested and received approval to work
23 remote for the week of May 3, 2021. In contrast, I requested to work
24 remote May 13, 14, and 17-19, 2021 for quarantine purposes and was
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1 denied by Christin and Nicholas, and was instructed to use my paid time
2 off (PTO). I became aware that on May 18, 2021, Nicholas made a
3 written statement (via email Re: subject Regina) to Joseph Petrino, “**I**
4 *make a point to make her use her own time*”, and Petrino responded,
5 **“Good!”** On this instance where I was denied remote work, Mitchell
6 Blustein, James Fasoli, and Nicholas sent out electronic communication
7 to all members of the networking group that there would be no remote
8 work for all those that report to Mitchell Blustein. Nicholas forwarded
9 correspondence to Mitchell stating **“Agreed. Head off the Regina**
10 *question ahead of time”*. These apparent disparities in treatment
11 coupled with the collaboration within the Information Technology Unit
12 leadership team, statements made by Nicholas, along with the sudden
13 change in the remote work policy for network engineers, exhibits overt
14 discrimination.

15 10. In May of 2021, I experienced a significant change in my daily job
16 duties demoting my role from a *Network Engineer* to that of a *Network*
17 *Technician*. It is important to note that no other Network Engineers
18 were required to perform any of the following tasks whether onsite or
19 off-site, summing up the role of a Network Technician. This was a clear
20 demotion in tasks, and I was now required to physically load and unload
21 vans with computer equipment, monitors, keyboards, and PC’s.
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1 Additionally, I was now required to travel to various legislative offices
2 to disconnect, move, reconnect computer equipment, and printers,
3 increasing exposure and risks of contracting COVID-19. This affected
4 my mental state significantly, causing increased anxiety, and physical
5 pain with the constant loading, lifting and moving of computer
6 equipment.

7
8 11. Effective October 25, 2021, OLS required all employees to provide
9 proof of full vaccination against Covid-19 or if unvaccinated,
10 employees were to submit weekly results of a negative COVID-19 PCR
11 test to Human Resources no later than 10:00 am, of the first day of the
12 workweek to gain entry into the workplace. Employees who did not
13 submit test results, were not permitted on-site, had to use accumulated
14 leave, and would not be permitted to work remote. On December 28,
15 2021, Charles Green did not want to use his (PTO). While awaiting his
16 Covid-19 test results Charles Green asked Nicholas Behmke if he could
17 work remote and his request was granted. Similarly, I (the plaintiff)
18 requested the same accommodations a week later on January 3, 2022,
19 (as the lab was backlogged on getting out test results) via email to
20 Christin Knox, and I received correspondence from Carly Diaz in
21 Human Resources stating that I would need to use my own leave time. I
22 responded protesting to her that I was aware others had been allowed to
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1 work remote while waiting for their test results. On January 4, 2022, I
2 emailed defendants, (Nicholas Behmke) and (Mitchell Blustein) asking
3 if I could work remote while waiting for my test results and Nicholas
4 Behmke denied my request and directed me to Human Resources to
5 which I had already received their denial.

6
7 12. Nicholas B. and Mitchell B consciously knowing they were facilitating
8 and perpetuating acts of blatant maltreatment, have shown a limpid
9 pattern of bias behavior and practices of continuous discrimination,
10 which created an extremely hostile work environment. Colleagues have
11 received directives not to share project information with me and my
12 supervisor Mitchell informed me that I was not to ask any of my
13 colleague's questions about any work projects, and to direct all of my
14 questions to him only.

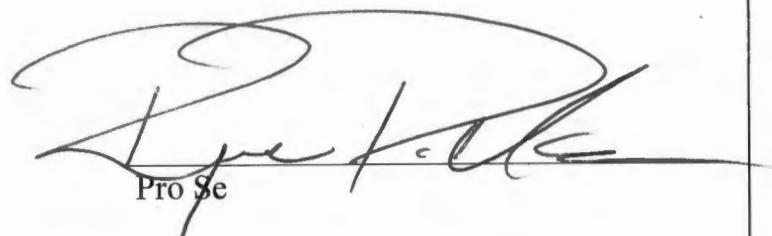
15
16 13. As a result of being subjected to their behavior I have experienced
17 emotional distress in the form of anxiety, emotional trauma, irritation,
18 indignation, and resentment all contributing to psychological stress as
19 the defendant was deliberate in having me travel to other legislative
20 offices increasing vulnerability to health risks, chances of contracting
21 the coronavirus, and ultimately increasing likeliness of possible death. I
22 would also like to mention that defendants were aware that I had lost my
23 father and other family members amid experiencing these changes and

1 challenges. I have experienced defendants' verbal response of, "*you*
2 *people always asking for time off or to leave early*". Enduring
3 humiliation by the demotion in my daily work duties, the stress, and
4 mental anguish, impelled me to seek professional treatment. This bias
5 treatment negatively affected my work environment, productivity and
6 the interaction between my longtime colleagues and supervisors.
7
8

9 Wherefore, Plaintiff requests that the Court:

- 10 • Reinstate all PTO time used and add seven additional sick days.
11
12 • Mandate all staff attend New Jersey Division of Civil Rights bias
13 training.
14
15 • Monetary relief for the amount of \$150,000.00 due to the emotional
16 distress and harms inflicted throughout the entirety of this
17 unfortunate experience. This amount covers a range of harms not
18 exhaustive, but includes anxiety, sleeplessness, loss of enjoyment of
19 professional environment, reputational harm, strained relationships
20 with family members, friends and colleagues, all court cost, fees
21 incurred, and any additional relief as determined by the Court.

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Pro Se